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8 **BEFORE THE**
BOARD OF REGISTERED NURSING
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. *2010-616*

12 **CATHERINE ROBERTA OTT-WILLIAMS,**
13 **a.k.a. CATHERINE ROBERTA WILLIAMS**
1547 33rd Street
14 Sacramento, CA 95816
Registered Nurse License No. 298463

A C C U S A T I O N

15 Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),
21 Department of Consumer Affairs.

22 2. On or about December 31, 1978, the Board issued Registered Nurse License Number
23 298463 to Catherine Roberta Ott-Williams, also known as Catherine Roberta Williams
24 ("Respondent"). Respondent's registered nurse license was in full force and effect at all times
25 relevant to the charges brought herein and will expire on February 29, 2012, unless renewed.

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4. Code section 2761 states, in pertinent part:

(a) Unprofessional conduct, which includes, but is not limited to, the following:

5. California Code of Regulations, title 16, section (“Regulation”) 1442 states:

6. Regulation 1443 states:

7. Regulation 1443.5 states, in pertinent part:

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1 Respondent failed to follow the "Five Rights" of medication administration, the right patient,
2 right drug, right dose, right time, and right route, in that Respondent failed to check the patient's
3 identification arm band or ask the patient her name, and failed to check the medication
4 administration record ("MAR") against the patient's name before administering the NPH Insulin
5 to the patient.

6 **SECOND CAUSE FOR DISCIPLINE**

7 **(Incompetence)**

8 12. Complainant incorporates by reference as though fully set forth herein the allegations
9 contained in paragraphs 9 and 10 above.

10 13. Respondent is subject to disciplinary action pursuant to Code section 2761,
11 subdivision (a)(1), on the grounds of unprofessional conduct, in that on or about August 4, 2007,
12 Respondent was guilty of incompetence in her care of patient E. A. within the meaning of
13 Regulation 1443, as follows:

14 a. Respondent failed to act as the patient's advocate and inform the patient that she was
15 giving her NPH Insulin before administering the injection, thereby depriving the patient of the
16 opportunity to tell Respondent that it was the wrong medication.

17 b. Respondent failed to report the medication error to the charge nurse and the patient's
18 physician in a timely manner.

19 **THIRD CAUSE FOR DISCIPLINE**

20 **(Unprofessional Conduct)**

21 14. Complainant incorporates by reference as though fully set forth herein the allegations
22 contained in paragraphs 9 and 10 above.

23 15. Respondent is subject to disciplinary action pursuant to Code section 2761,
24 subdivision (a), in that Respondent committed acts constituting unprofessional conduct in her care
25 of patient E. A., as follows:

26 a. Respondent failed to take a second set of vital signs on the patient within four hours
27 of taking the first set of vital signs per UCDMC's policy pertaining to first day cesarean section
28 patients.

b. At approximately 1500 hours on August 4, 2007, Respondent administered an IV fluid bolus of D5LR and infused 1000 cc's before notifying the patient's physician and without a physician's order.

c. Respondent formula fed the patient's infant (due to the patient's symptoms of hypoglycemia) without the patient's permission.

d. Respondent failed to follow UCDMC's "Code of Ethics and Professional Conduct/Patient Care Structure Standards" by taking matters into her own hands and administering the IV fluid bolus of D5LR to the patient before notifying the patient's physician and without a physician's order, and by administering the NPH Insulin to the patient before telling her what medication she was being given.

e. Respondent failed to follow UCDMC's policy and procedure, Patient Identification for the Hospitalized Patient, by failing to check the patient's identification arm band against the patient's chart or MAR, as above.

PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 298463, issued to Catherine Roberta Ott-Williams, also known as Catherine Roberta Williams;

2. Ordering Catherine Roberta Ott-Williams, also known as Catherine Roberta Williams, to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3;

3. Taking such other and further action as deemed necessary and proper.

DATED:

5/28/10

Louise R. Bailey
LOUISE R. BAILEY, M.ED., RN
Interim Executive Officer
Board of Registered Nursing
Department of Consumer Affairs
State of California
Complainant

SA2010100503